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Attorney for Defendant
XAVIER ROBERTS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

| | | |
|---------------------------|---|-----------------------------------|
| UNITED STATES OF AMERICA, |) | Case No: 2:24-CR-0309-WBS |
| |) | |
| Plaintiff, |) | |
| |) | STIPULATION AND ORDER TO CONTINUE |
| vs. |) | STATUS CONFERENCE AND EXCLUDE |
| |) | TIME |
| XAVIER ROBERTS, |) | |
| |) | District Judge William B. Shubb |
| Defendant. |) | New Date: January 26, 2026 |
| |) | Time: 10:00 a.m. |
| |) | |

IT IS HEREBY STIPULATED and requested by and between the parties through their respective counsel, HEIKO COPPOLA, Assistant United States Attorney, attorney for the UNITED STATES, and RACHELLE BARBOUR, attorney for Defendant XAVIER ROBERTS, that the status conference currently set for Monday, December 8, 2025, be continued to Monday, **January 26, 2026, at 10:00 a.m.**, and that time be excluded for preparation of counsel.

The Government has provided hundreds of documents and dozens of video files for Defense counsel's review in this case. Since the start of the case, Defense counsel has been reviewing and analyzing the above, conducting legal research, meeting with her client, and otherwise preparing for trial. The above tasks are ongoing, and the defense requires additional time to review discovery, discuss the case with her client and the Government, conduct further research in support of a plea resolution, and continue to prepare.

The parties expect to finalize a plea agreement in the additional time requested and provide it to the Court for its review in anticipation of a change of plea at the next hearing. The

1 parties believe that failure to grant the requested continuance would deny defense counsel the
2 reasonable time necessary for effective preparation, taking into account the exercise of due
3 diligence. Mr. Roberts is out of custody in this matter and has urgent medical care scheduled
4 prior to the requested new court date.

5 Accordingly, the parties stipulate and request that the Court exclude time between the
6 date of the filing of this stipulation through the new status conference date of January 26, 2026,
7 under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of
8 justice served by continuing the case as requested outweigh the interest of the public and the
9 defendant in a trial within the original date prescribed by the Speedy Trial Act.

10 Date: November 10, 2025

11 HEATHER E. WILLIAMS
12 Federal Defender

13 /s/ Rachelle Barbour
14 RACHELLE BARBOUR
15 Attorney for Defendant
XAVIER ROBERTS

16 Date: November 10, 2025


17 ERIC GRANT
18 United States Attorney

19 /s/ Heiko Coppola
20 HEIKO COPPOLA
21 Assistant U.S. Attorney
22 Attorney for the United States

23 O R D E R

24 The Court, having received and considered the parties' stipulation, and good cause
25 appearing therefrom, adopts the parties' stipulation in its entirety as its order.

26 Dated: November 12, 2025

27 
28 WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE